

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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THOMAS M. [unclear]
CLERK, U.S. DISTRICT COURT
W.D. OF TN, MEMPHIS

Dominique Curry
6499 Saginaw Rd
Bartlett, TN 38134

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Brothers International
7819 N. Brothers Blvd
Bartlett, TN 38134

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Dominique Curry
(name of plaintiff)

is a citizen of the United States and resides at 6499 Saginaw Rd
(street address)

Bartlett U.S.A. Tn.
(city) (country) (state)

38134 (901) 550-8564
(zip code) (telephone number)

3. Defendant

Brothers International

lives at, or its business is located at

7819 N. Brothers BlvdBartlett, Tn. 38134

(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at

7819 N. Brothers BlvdBartlett

(city)

U.S.A.

(country)

Tn.

(state)

38134

(zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about

5th

(day)

8th

(month)

2011

(year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about

8th

(day)

8th

(month)

2011

(year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about

8th

(day)

8th

(month)

2011

(year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on

12th

(day)

8th

(month)

2011

(year)

(Attach a copy of the notice to this complaint.)

9. Because of plaintiff's (1) ___ race, (2) ___ color, (3) X sex, (4) ___ religion, (5) ___ national origin, defendant

(a) ___ failed to employ plaintiff.

(b) X terminated plaintiff's employment.

(c) ___ failed to promote plaintiff.

(d) ___

10. The circumstances under which defendant discriminated against plaintiff were as follows: The reason given for my termination was for low productivity; However there was a male (Corey) employee whose productivity was low as well, but he was not fired. I also believe I was replaced by 40 male employees who had less experience in the position than I had

I believe I have been discriminated against because of my gender (female) in violation of Title VII of the Civil Rights Act of 1964, as amended

11. The acts set forth in paragraph 9 of this complaint

- (a) ☐ are still being committed by defendant.
 (b) ☒ are no longer being committed by defendant.
 (c) ☐ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☐ Defendant be directed to employ plaintiff, or
 (b) ☐ Defendant be directed to re-employ plaintiff, or
 (c) ☐ Defendant be directed to promote plaintiff, or;
 (d) ☐ Defendant be directed to Justification + loss wages plus pain + suffering

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ☒ No ☐

Dominique Curry
 SIGNATURE OF PLAINTIFF